

WHEREFORE, Defendants Julio Rios and Jeremy Gamboa respectfully request that this Court enter the proposed Order submitted herewith, dismissing Plaintiff's claims against them on the grounds that this Court lacks personal jurisdiction over them and that Plaintiff has failed to state a claim upon which relief may be granted.

DATE: March 16, 2017

Respectfully submitted,

/s/ Jeremy A. Fielding

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CERTIFICATE OF SERVICE

I, Julie Negovan, hereby certify that I filed and served the foregoing Motion to Dismiss of Julio Rios and Jeremy Gamboa to all counsel of record via the Court's ECF system on this date as follows:

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Dated: March 16, 2017

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